

Privacy Policy of Checkit for Checkit App

This Application collects some Personal Data from its Users.

POLICY SUMMARY

Personal Data collected for the following purposes and using the following services:

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- **Device permissions for Personal Data access**
 - **Device permissions for Personal Data access**
Personal Data: Approximate location permission (non-continuous); Call permission; Camera permission; Phone permission; Photo Library permission; Storage permission
- **Infrastructure monitoring**
 - **Sentry**
Personal Data: various types of Data as specified in the privacy policy of the service

- **Internal processing tools**
 - **Google Firebase Core and ML Kit for Firebase**
- #### Further information about Personal Data

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- **Push notifications**
This Application may send push notifications to the User.
- **The Service is not directed to children under the age of 13**
Users declare themselves to be adult according to their applicable legislation. Minors may use this Application only with the assistance of a parent or guardian. Under no circumstance persons under the age of 13 may use this Application.
- **Unique device identification**
This Application may track Users by storing a unique identifier of their device, for analytics purposes or for storing Users' preferences.

Contact information

- **Owner**

See below

FULL POLICY

Owner

Checkit Europe Ltd or Checkit UK Ltd (the name of the company with which you are contracting will be specified in your quote).

Checkit Europe Ltd is a company registered in England and Wales with company number 9343487 whose registered office is at Broers Building, 21 JJ Thomson Avenue, Cambridge, CB3 0FA, United Kingdom.

Checkit UK Ltd is a company registered in England and Wales with company number 2540171 whose registered office is at Broers Building, 21 JJ Thomson Avenue, Cambridge, CB3 0FA, United Kingdom.

Owner contact email: legal@checkit.net.

Terms of Service

This Application is to be used in accordance with the Checkit Terms of Service available here:
https://www.checkit.net/customer_tc/ and “you “ has the meaning there attributed

Data

You will own all right, title and interest in and to all of the Data and shall have sole responsibility for its legality, reliability, integrity, accuracy and quality. You are the Data Controller of the Data, to the extent it consists of Personal Data.

We require Personal Data about your Authorised Users (comprising identifiers such as names, email addresses and mobile telephone numbers) to be stored on our systems so that you can access it and to enable you to instruct us to set up reports for you using such Personal Data. To that limited extent only we process Personal Data in connection with your Subscription as your Data Processor. Except as expressly set out in this Privacy policy, you will not transfer, process or otherwise transmit any Personal Data to us or request, authorise or permit us to process any Personal Data. To the limited extent that we are your Data Processor, as described above, you may only give us instructions to process such Personal Data within those limits and may not instruct us to process Personal Data such that you or we may breach Data Protection Laws.

You also agree to us accepting and using the Data in order to assist you with your use of Checkit but accept that we have no duty to do so.

You further agree and acknowledge that we may, for our own purposes, anonymise any of the Data which is Personal Data so that it is no longer capable of identifying individuals, and further process it for product development, benchmarking, research and marketing purposes. Except to that extent, we are not the Data Controller of any Data.

You agree to allow us to audit your and/or the Authorised Users' use of Checkit to ensure that these Terms of Service are being complied with. We will give you reasonable advance notice if we wish to carry out an audit. This audit right does not entitle us to access to confidential intellectual property or financial, payroll, personnel or other confidential records that belong to you that do not relate directly to the Subscription.

Without limiting any other provision of this Privacy policy, you are responsible for and undertake to obtain all necessary consent from all Data Subjects with respect to the processing and storage of Data by you or by Checkit, including but not limited to their explicit consent (in accordance with Article 49 of the GDPR), after having been informed of the risks of the repatriation of Data from storage locations in other jurisdictions.

We will follow our archiving procedures for Data stored in the cloud as set out in our current data back-up policy available on request. In the event of any loss or damage to Data, your sole and exclusive remedy shall be for us to use reasonable commercial endeavours to restore the lost or damaged Data from the latest back-up of such Data we maintain. We will not be held responsible for any loss, destruction, alteration or disclosure of Data caused by any third party. Data stored by us may be held in the UK, the USA, Germany and Ireland.

We will use our reasonable endeavours to ensure that appropriate safety and security services and procedures are maintained and enforced to prevent unauthorised access or damage to the Data or the Cloud Software.

You agree to indemnify us, our employees, subcontractors and agents against all losses, liabilities, damages, fines, penalties and expenses (including reasonable legal fees) incurred by us arising from any breach by you, your employees and agents of this Privacy policy and/or the Data Protection Laws.

The terms “Data Controller”, “Data Processor” and “Data Subject” have the meanings given to them in the Data Protection Laws.

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Camera permission; Approximate location permission (non-continuous); Phone permission; Storage permission; Photo Library permission; Call permission.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for. Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfil such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Device permissions for Personal Data access, Infrastructure monitoring and Internal processing tools.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

Device permissions for Personal Data access

Depending on the User's specific device, this Application may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed.

Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document.

The exact procedure for controlling app permissions may be dependent on the User's device and software. Please note that the revoking of such permissions might impact the proper functioning of this Application.

If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e. accessed to, modified or removed) by this Application.

Approximate location permission (non-continuous)

Used for accessing the User's approximate device location. This Application may collect, use, and share User location Data in order to provide location-based services.

The geographic location of the User is determined in a manner that isn't continuous. This means that it is impossible for this Application to derive the approximate position of the User on a continuous basis.

Call permission

Used for accessing a host of typical features associated with telephony.

Camera permission

Used for accessing the camera or capturing images and video from the device.

Phone permission

Used for accessing a host of typical features associated with telephony. This enables, for instance, read-only access to the “phone state”, which means it enables access to the phone number of the device, current mobile network information, or the status of any ongoing calls.

Photo Library permission

Allows access to the User's Photo Library.

Storage permission

Used for accessing shared external storage, including the reading and adding of any items.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- **Device permissions for Personal Data access**
- **Infrastructure monitoring**
- **Internal processing tools**

Further information about Personal Data

- **Push notifications**
- **The Service is not directed to children under the age of 13**
- **Unique device identification**

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.

- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

This Application does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honour the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilised by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the User of this Application.

This Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to this Application, if not stated otherwise within this document.

Latest update: 18th December 2020